

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JOANNA CASTRO,
PLAINTIFF

V.

Case No. 5:18-CV-312-DAE

ALBERT SALINAS, et al.
DEFENDANTS

**PLAINTIFF'S UNOPPOSED MOTION TO EXTEND TIME TO FILE RESPONSE
TO DEFENDANTS' FRCP RULE 12(B)(6) MOTION TO DISMISS**

TO THE HONORABLE DISTRICT COURT JUDGE EZRA:

Now comes Plaintiff, Joann Castro, and moves the Court to extend time to file her response to the Defendants' Motion to Dismiss for Defendants Valenciano and the City of Olmos Park, and would show as follows in support of said Motion:

1. Defendants filed their Motion to Dismiss on February 15, 2019.
2. Counsel for Castro was set for trial on the following criminal cases between then and the date the response was due: *State v. Arnold Ojeda*, Cause No. 8717595, in Austin Municipal Court on February 26th. This setting required Counsel's attention to prepare, and counsel had other criminal cases set on courts' dockets which required her time and attention.
3. Leading up to the due date for her response, Counsel had two cases set for trial the week of March 4th, including *State v. Cedric Irvin*, Cause Number C-1-CR-18-151621, in Travis County Court at Law 4, and *State v. Stormi Ortega*, Cause Number C-1-CR-18-

201206 in Travis County Court at Law 7. Both required preparation the weeks prior to the settings. *Irvin* was reset at the last minute before jury selection on Monday, March 4, 2019. *Ortega* appears to be first in line for trial on Wednesday, March 6, 2019.

4. Because of the time she committed to her criminal docket, counsel requires additional time to file her response in opposition to the Defendants' Motion to Dismiss.
5. This Motion is not made for the purpose of delay, but so that justice may be done.
6. Counsel asks for an extension until March 15, 2019 to file her response in opposition to the Defendants' Motion to Dismiss.
7. Opposing Counsel is UNOPPOSED to this extension.

Respectfully Submitted,
PLAINTIFF

By:

/s/ Millie L. Thompson

Millie L. Thompson

Texas State Bar Number: 24067974

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Certificate of Conference

I, Millie Thompson, do hereby certify that on March 4, 2019, I conferenced with Adolfo Ruiz regarding this Motion by telephone. He is unopposed.

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/s/ Millie L. Thompson
Millie Thompson, Plaintiff's Attorney

Certificate of Service

I, Millie Thompson, do hereby certify that on this the 4th day of March 2019, a true and correct copy of this Plaintiff's Motion to Extend Time to File was served on all parties of record via email to

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/s/ Millie L. Thompson
Millie Thompson, Plaintiff's Attorney